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April 20, 2022

Via ECF

Honorable Robert D. Drain United States Bankruptcy Court Southern District of New York 300 Quarropas Street White Plains, NY 10601-4140

In re: Finger Lakes Massage Group, Inc. Chapter 7
Case No. 20-22275-RDD
Magaliff v. Robinson, et al.,
Adv. Proc. No. 22-07017 (RDD)

Judge Drain:

cc:

Our office has recently been retained by defendant John Robinson in the above action. We have begun investigation of the matter and have been in contact with counsel for the Plaintiff to discuss extending the time for Defendants to respond to the Complaint, that deadline currently being set as April 21, 2022, along with other factual issues pertaining to the case. In light of our continuing investigation around the facts and issues alleged in the Complaint, we respectfully request, and Plaintiff has consented to, an extension of the deadline for all defendants to respond to the Complaint by sixty (60) days to June 20, 2022.

We further note that the initial conference in this matter has been scheduled for March 4, 2022, at 10:00 a.m. While we are available to appear for that conference should the Court wish to keep that scheduled date, given our incoming status and requested extension of time to answer, our office would not object if the Court wished to adjourn that conference to a future date. We do note, however, that Plaintiff's counsel has a expressed a seeming preference to appear on the scheduled date and provide the Court with a status update at that time. We thank you for your attention to this matter.

Respectfully submitted, <u>s/Jason A. Stewart</u> Jason A. Stewart

Howard Magaliff, as Trustee (Via ECF & E-Mail)